

**LOWENSTEIN SANDLER PC**

Sharon L. Levine, Esq.  
Wojciech F. Jung, Esq.  
Suzanne Iazzetta, Esq.  
1251 Avenue of the Americas, 18th Floor  
New York, New York 10020  
Tel: (212) 262-6700  
Fax: (212) 262-7402

*Proposed Counsel to the  
Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

ION MEDIA NETWORKS, INC., *et al.*,

Debtors.

Chapter 11

Case No. 09-13125 (JMP)

(Jointly Administered)

**NOTICE OF APPLICATION FOR AN ORDER PURSUANT TO 11 U.S.C. §§ 328(a) AND  
1103 AUTHORIZING AND APPROVING THE EMPLOYMENT AND RETENTION OF  
CHANIN CAPITAL PARTNERS AS FINANCIAL ADVISORS TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS**

**PLEASE TAKE NOTICE** that upon the annexed application for an Order pursuant to 11 U.S.C. §§ 328(a) and 1103 and Federal Rule of Bankruptcy Procedure 2014(a) authorizing and approving the employment and retention of Chanin Capital Partners (“**Chanin**”) as financial advisors to the Official Committee of Unsecured Creditors (the “**Committee**”), effective as of June 23, 2009, (the “**Application**”), the Committee, by its proposed attorneys, Lowenstein Sandler PC, will move before the Honorable James M. Peck at the United States Bankruptcy Court, Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004-1408 on July 30, 2009 at 10:00 a.m. (the “**Hearing**”), or as soon thereafter as counsel may be heard, for entry of an Order granting the relief set forth in the Application.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application must be in writing, must conform to the requirements of the Bankruptcy Code, the Bankruptcy Rules and the Local Rules of the United States Bankruptcy Court for the Southern District of New York, and must be filed and served so as to be received no later than 5:00 p.m. on July 23, 2009 (the “**Objection Deadline**”).

**PLEASE TAKE FURTHER NOTICE** that pursuant to General Order M-242, as amended by General Order M-269, any objection filed by parties with legal representation shall be filed on or before the Objection Deadline (i) through the Bankruptcy Court’s Electronic Case Filing System (“**ECF**”) which may be accessed at the Bankruptcy Court’s Internet web site at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), using Netscape Navigator software version 3.0 or higher, and (ii) in portable document format (“**PDF**”) using Adobe Exchange software for conversion.

**PLEASE TAKE FURTHER NOTICE** that any party that is either without legal representation or that is unable to file documents electronically shall file its objection on or before the Objection Deadline in PDF format on a 3-1/2” floppy diskette in an envelope clearly marked with the case name, case number, type and title of document, document number of the document to which the objection refers and the file name of the document.

**PLEASE TAKE FURTHER NOTICE** that a hard copy of any objection must be delivered to the Chambers of the Honorable James M. Peck at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-1408, on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, must be filed and served in accordance with the provisions of the General Order M-242, as amended by General Order M-269, so that they are received on or before the Objection Deadline by Lowenstein Sandler PC, proposed attorneys for the Committee, 1251 Avenue of the Americas, 18th Floor, New York, New York 10020, Attn: Sharon L. Levine, Esq. and Wojciech F. Jung, Esq.

**PLEASE TAKE FURTHER NOTICE** that unless an objection to the Application is filed and served by the Objection Deadline, the Court may enter an Order approving the Application prior to the Hearing.

Respectfully submitted,

**LOWENSTEIN SANDLER PC**

/s/ Sharon L. Levine

Sharon L. Levine, Esq. (admitted *pro hac vice*)  
1251 Avenue of the Americas, 18<sup>th</sup> Floor  
New York, New York 10020  
(212) 262-6700 (Telephone)  
(212) 262-7402 (Facsimile)

-- and --

65 Livingston Avenue  
Roseland, New Jersey 07068  
(973) 597-2500 (Telephone)  
(973) 597-2400 (Facsimile)

*Proposed Counsel to the  
Official Committee of Unsecured Creditors*

Dated: July 14, 2009  
New York, New York